

MANAGEMENT OF DRILLING WASTE

General Chemical Corp. (GCC) will manage the drilling waste generated during implementation of MassDEP-required site investigation work as follows:

1. Although GCC's facility is in process of closure, GCC retains its designation as a large quantity generator (LQG), and will manage hazardous waste generated on its behalf in accordance with all applicable LQG requirements in 310 CMR 30.00.
2. For wells installed within GCC's facility property, waste will be placed in 55-gallon steel drums as it is being generated by the driller. The drums will be labeled as to the expected hazardous waste classification (based on prior well work and GCC-generator knowledge), and in compliance with 310 CMR 30.341(2). Drums will be kept closed except when adding new drilling waste, and will be moved by fork-truck between drilling locations until filled.
3. Full drums will be moved by fork-truck to the designated accumulation area in the warehouse (see attached plant layout). This area is sign-posted as a hazardous waste area in accordance with 310 CMR 30.341(4), and has a base which is free of cracks or gaps. Spill control for drums containing liquids will be accomplished by use of perimeter absorbent booms or by placing drums on spill pallets.
4. Waste generated at wells installed for GCC on abutting properties will be managed the same as above. Drums (either full or partial) will be moved to GCC's designated accumulation area in one of two ways. When practical, drums may be moved via fork truck, provided the route does not involve driving along Leland St. or any other public roadway. Drums moved in this manner are not subject to MassDEP transporter regulations or USDOT rules. Alternately, drums may be moved via VID'd truck of a MA-licensed transporter and documented via a tracking manifest (for DOT compliance only: not for distribution). The "generator" on tracking manifests will be General Chemical Corporation, and the site address will indicate the approximate location of the well(s) (e.g., Exelon access road off Leland St., 91 Leland Street, etc.). Drums generated on abutting properties will be brought to the GCC facility at the end of each day's drilling (no drums are to be left on abutting property overnight). Partially full drums may be returned to the drilling location when drilling resumes, and transported by either of the methods discussed above.
5. Drums will remain in the accumulation area until they have been approved for shipment to a licensed treatment or disposal facility. The maximum holding time for a drum will be 90-days.
6. GCC plans to ship drums out after approximately 15-20 drums have been accumulated, but will do so sooner if required by space limitations or the 90-day limit. The entire drilling operation, including wells installed on abutting properties, is expected to generate approximately 135, 55-gallon drums.
7. Either Clean Venture, Inc. or another MA-licensed hazardous waste transporter will transport drums from the GCC facility to the designated facility on the outbound manifest.
8. GCC will utilize applicable portions of its existing hazardous waste license (27B/2006) to provide applicable controls during waste accumulation, and to comply with 310 CMR 30.342. This includes, but is not limited to the following license "attachments:"
 - a. Security Plan - Attachment II
 - b. Inspection Plan - Attachment III
 - c. Contingency Plan - Attachment V (as modified for waste accumulation only)
9. Different well wastes can be mixed together as long as they are the same waste characterization. If non-hazardous drilling waste is mixed with hazardous drilling waste in the same container, the mixture will be managed as "hazardous waste."

Revised October 9, 2012